

Exhibit "C"

Received In Hand
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1/22/2018
DPA

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

NATIONAL LIABILITY & FIRE INSURANCE CO.

and

BOAT OWNERS ASSOCIATION OF THE
UNITED STATES

Plaintiffs,

v.

NATHAN CARMAN

Defendant.

RECEIVED

JAN 23 2018

LATTI & ANDERSON

Civil Action No: 17-0038-S-PAS

In Admiralty

PLAINTIFFS' SECOND SUPPLEMENTAL DISCLOSURES

Plaintiffs/counterclaim defendants NATIONAL LIABILITY & FIRE INSURANCE
COMPANY ("NLFIC") and BOAT OWNERS ASSOCIATION OF THE UNITED STATES
("BoatU.S."), by and through their attorneys supplement their Fed. R. Civ. P. 26 disclosures:

Michael Pellerin
Vice President, Marine Insurance Underwriting
BoatU.S.
880 South Pickett Street
Alexandria, VA 22304
(800) 283-2883
c/o undersigned counsel

NLFIC, BoatU.S. and affiliates' relationship; underwriting and policy
issuance; website; Nathan Carman's Yacht Policy;
BoatU.S. contacts with Nathan Carman regarding his policy

Records Custodian
Wayback Machine
Internet Archive
300 Funston Avenue
San Francisco, CA 94118

Archives BoatU.S. website pages available at:
<http://web.archive.org/web/20151205010130/http://www.boatus.com:80/insurance/policy.asp>

Bud Smedburg
Point Judith Marina
392 Gooseberry Road
South Kingstown, RI 02879
(401) 789-7189
c/o Attorney Steve Morrissey
Houlihan, Managhan, Morrissey and Kyle, Ltd.
195 Broadway, 2nd Floor
Newport, RI 02840
(401) 846-7777

Work performed on Nathan Carman's boat; re-built engine
installation after overheat; sea trials; troubleshoot various complaints
such as oil leak; bilge pump electrical problems

John and Nancy Ferreira
327 Ronald Avenue
Cumberland, RI 02864
(401) 333-5918

Contact and observations of Nathan Carman and boat at Ram Point
Marina

CDR Michael Fazio, USCG or designee
408 Atlantic Avenue
Boston, MA 02110
617-223-8500

USCG FOIA documents provided to both parties regarding sinking of
Nathan Carman's boat including SAR efforts, September 18, 2016 cell
ping and course, ORIENT LUCKY rescue and location

West Marine (Middletown, RI and Narragansett, RI) and Jamestown Distributors
personnel identified in defendant's answer to plaintiffs' Interrogatory No. 6, on
same topics.

Other persons identified in answer to plaintiffs' Interrogatory No. 6, on same
topics

ORIENT LUCKY Captain and Crew

Eric Greene, ECF No. 1-1 at 10-18, anticipated expert

Mike McCook, ECF No. 1-1 at 19-20, anticipated expert

RESPECTFULLY SUBMITTED January 22, 2017.

Respectfully Submitted,



David J. Farrell, Jr.

Pro Hac Vice

Liam T. O'Connell

Pro Hac Vice

Farrell McAleer & Smith LLP

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/s/ Sean T. O'Leary

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Warwick, Rhode Island 02886

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Certificate of Service

I served this second supplemental disclosure
in hand on Atty Anderson and by email to
Atty Humphrey 01/22/2018.

/s/ David J. Farrell, Jr.